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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEVE HESSE and ADAM BUXBAUM, on  
behalf of all others similar situated,

Case No. 1:19-cv-0972-AJN

Plaintiffs,

v.

GODIVA CHOCOLATIER, INC.,

Defendant.

**DECLARATION OF ELI LEHRER**

I, Eli Lehrer, declare as follows:

1. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. My business address is 1212 New York Ave. NW, Suite 900, Washington, DC 20005. My telephone number is (202) 525-5719. My email address is elehrer@gmail.com.

3. I am a member of the settlement class in this case and filed an objection to the proposed settlement, including the *cy pres* provision and proposed recipient, and attorneys' fee request.

4. I have reviewed the three new *cy pres* recipients proposed by the parties. I do not wish to fund, associate with, or otherwise support the National Consumer Law Center, Center for Science in the Public Interest, or National Advertising Division of the Better Business Bureau. Reasons for this positions are set forth in the letter response filed contemporaneously with this declaration.

5. Among the reasons, the National Consumer Law Center engaged in advocacy that I believe is directly contrary to the interests of consumers. The R Street Institute, where I serve as president, has researched insurance policy since its founding in 2012, and its scholars have found that removing the ability of insurance companies to use credit information in risk ratings is likely to lead to increased premiums for consumers purchasing homeowners and automobile insurance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2022, in Washington, DC.

Eli Lehrer

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